

EXHIBIT L

In the Matter Of:

USA v

GOOGLE

MICHAEL SHAUGHNESSY

August 09, 2023



Page 1	Page 3
<p>1 2 UNITED STATES DISTRICT COURT 3 FOR THE EASTERN DISTRICT OF VIRGINIA 4 -----X 5 UNITED STATES OF AMERICA, et al, 6 7 PLAINTIFF, 8 9 -against- 10 11 GOOGLE LLC, 12 13 DEFENDANT. 14 Civil 1:23-cv-00108 15 -----X 16 17 DEPOSITION OF MICHAEL SHAUGHNESSY 18 New York, New York 19 Wednesday, August 9, 2023 20 21 Reported by: 22 Rebecca Schaumloffel, RPR, CLR 23 JOB #: 2023-906148 24 25</p>	<p>1 M. SHAUGHNESSY 2 THE VIDEOGRAPHER: We are now on 3 the record. My name is Lem Lattimer. 4 I'm a legal videographer retained by 5 Lexitas. Today's date is Wednesday, 6 August 9, 2023, and the video time is 7 10:00 a.m. 8 The deponent is Michael 9 Shaughnessy in the matter of the 10 United States of America versus Google 11 LLC. All appearances are noted on the 12 record. 13 Will the court reporter, Rebecca 14 Schaumloffel, please swear in the 15 witness. 16 17 18 19 MICHAEL SHAUGHNESSY, called as a witness, 20 having been first duly sworn by a Notary 21 Public of the States of New York, New Jersey, 22 and Pennsylvania was examined and testified 23 as follows: 24 EXAMINATION BY 25 MR. WOLIN:</p>
Page 2	Page 4
<p>1 2 A P P E A R A N C E S : 3 4 DEPARTMENT OF JUSTICE 5 Attorneys for the Plaintiff 6 950 Pennsylvania Avenue 7 New York, New York 20530 8 BY: MICHAEL WOLIN, ESQ. 9 KAITLYN BARRY, ESQ. 10 11 AXINN, VELTROP & HARKRIDER, LLP 12 Attorneys for Google 13 1901 L Street NW 14 Washington, DC 20036 15 BY: CHRIS ERICKSON, ESQ. 16 17 PAUL, WEISS, RIFKIND, WHARTON & GARRISON 18 Attorneys for the Defendant 19 Google 20 1285 6th Avenue 21 New York, New York 10019 22 BY: ERIN MORGAN, ESQ. 23 CARTER GREENBAUM, ESQ. 24 25 DAVIS & GILBERT 26 Attorneys for Kargo 27 1675 Broadway 28 New York, New York 10019 29 BY: INA B. SCHER, ESQ. 30 31 ALSO PRESENT: 32 33 Lem Lattimer, Lexitas 34 * * * 35</p>	<p>1 M. SHAUGHNESSY 2 Q. Good morning, Mr. Shaughnessy. My 3 name is Michael Wolin. I'm here on behalf of 4 the United States of America. I'm from the 5 Department of Justice Antitrust Division. 6 I'm joined here by my colleague, Kaitlyn 7 Barry, also an attorney for the United States 8 of America. 9 Could you please state your name 10 for the record, please. 11 A. Yes. Michael Shaughnessy. 12 Q. I would like to -- let me ask you 13 first, sir, have you been deposed before? 14 A. No. 15 Q. So I'm going to start, then, with 16 some procedures, just some ground rules so 17 that the deposition goes smoothly. 18 Is that okay? 19 A. Yes. 20 Q. Our court reporter will record 21 everything we say here today. So to assist 22 her, could you please speak loudly and 23 clearly and wait until I finish my question 24 before you start your answer? 25 A. Yes.</p>

Page 5

1 M. SHAUGHNESSY
2 Q. And I will wait to finish -- or I
3 will wait till you finish your answer before
4 I start another question. All right?
5 A. Yes.
6 Q. If any of my questions are
7 unclear, please let me know, and I'll clarify
8 the question. Okay?
9 A. Yes.
10 Q. We'll take periodic breaks today.
11 If you ever need a break, please let me know,
12 and we will accommodate that at the next
13 convenient moment. All right?
14 A. Yes.
15 Q. So you understand all of those
16 ground rules?
17 A. I do.
18 Q. Two other preliminary questions I
19 want to ask you this morning.
20 Do you understand that you are
21 under oath today and sworn to tell the truth
22 just as if you were testifying in court
23 before a judge?
24 A. Yes.
25 Q. And do you understand that the

Page 6

1 M. SHAUGHNESSY
2 information you provide during this
3 deposition may be used by the Department of
4 Justice in other civil, criminal,
5 administrative, or regulatory cases or
6 proceedings?
7 A. Yes.
8 Q. Mr. Shaughnessy, where were you
9 born and raised?
10 A. I was born and raised in Port
11 Jefferson, New York. I lived in Miller
12 Place.
13 Q. What's your educational
14 background?
15 A. My educational background is I
16 have a Bachelor's of Science in accounting
17 and I graduated from Northeastern University.
18 Q. What year did you graduate from
19 Northeastern University?
20 A. 2010.
21 Q. Where are you currently employed?
22 A. Kargo.
23 Q. When did your employment at Kargo
24 begin?
25 A. In 2018.

Page 7

1 M. SHAUGHNESSY
2 Q. Where were you employed prior to
3 Kargo?
4 A. I was employed by a few companies,
5 including Evite, IAC, which was About.com,
6 and Bauer Media.
7 Q. I want to ask you about your role
8 at each of those companies.
9 What was your role at Evite?
10 A. At Evite I was the finance
11 manager.
12 Q. What years were you employed by
13 Evite?
14 A. 2013 through 2014.
15 Q. What about your role at About.com
16 or IAC?
17 A. At About.com I was primarily
18 focused on being the programatic yield
19 manager.
20 Q. What years were you the
21 programatic yield manager at IAC or
22 About.com?
23 A. Around 2014 to 2016.
24 Q. What was your role at Bauer Media?
25 A. I was the Vice President of

Page 8

1 M. SHAUGHNESSY
2 revenue.
3 Q. Of those three companies, which
4 would you consider to be website publishers?
5 A. All three.
6 Q. Let's turn back to your current
7 employment. All right?
8 A. Yes.
9 Q. At a high level, what is Kargo's
10 business?
11 A. Kargo is a business that
12 transforms standard creative and creates
13 bespoke experiences for the largest
14 advertisers as well as the best publishers.
15 Q. And what's your role at Kargo?
16 A. I am currently the Chief Operating
17 Officer.
18 Q. What are your responsibilities as
19 Chief Operating Officer?
20 A. My responsibilities include taking
21 the vision of our CEO/founder and
22 operationalizing that across all of the
23 different teams within the organization and
24 facilitating, as well as the execution.
25 Q. In your role at Kargo, how often

Page 9

1 **M. SHAUGHNESSY**
2 **do you interact with publishers?**
3 A. Frequently.
4 **Q. Could you give me some examples of**
5 **some of the publishers that you interact**
6 **with?**
7 A. Yes. We work with the largest
8 publishers which have taken their magazine
9 businesses and made them digital businesses,
10 so think of the Meredith and the Hearst.
11 We also work with digital first
12 publishers, including Bustle and BuzzFeed,
13 and then we work with broadcasters like CBS,
14 NBC, and Discovery.
15 **Q. Your role at Kargo, how often do**
16 **you interact with advertising agencies?**
17 A. Pretty frequently.
18 **Q. What are some of the advertising**
19 **agencies that you interact with in your role**
20 **at Kargo?**
21 A. We work with all of the largest
22 holding companies and their -- I'm usually
23 brought in to different clients on an ad hoc
24 basis. I wouldn't say it's a primary role
25 for my function.

Page 10

1 **M. SHAUGHNESSY**
2 **Q. How often are you typically**
3 **interacting with advertising agencies?**
4 A. It depends on the business needs.
5 Not as frequently as the publishing clients
6 because we have other individuals in the
7 executive team that are primarily focused on
8 sales.
9 **Q. Could you estimate how many times**
10 **a year you are having direct interactions**
11 **with advertisers?**
12 A. I would approximate dozens, but I
13 don't know an exact number.
14 **Q. How often do you interact with**
15 **companies that are running their own**
16 **advertising campaigns in-house?**
17 A. Can you explain the question or
18 ask it a different way?
19 **Q. How often do you interact with**
20 **companies that, instead of using an**
21 **advertising agency, are doing their own**
22 **advertising campaigns themselves?**
23 A. Understood.
24 A decent amount but it's not as
25 common for a business model.

Page 11

1 **M. SHAUGHNESSY**
2 **Q. In your role at Kargo, how often**
3 **do you interact with employees of Google?**
4 A. Somewhat frequently, but there are
5 individuals on my team that are tasked with
6 managing those relationships on a more
7 day-to-day level.
8 **Q. I want to focus, then, on the --**
9 **we will start with the term "SSP," or "supply**
10 **side platform."**
11 **Are you familiar with that term?**
12 A. Yes.
13 **Q. And what are the functions of an**
14 **SSP?**
15 A. The SSP is an opportunity for the
16 sell side to make their inventory available
17 for sale.
18 **Q. Is part of Kargo's business offer**
19 **a supply side platform?**
20 A. Yes.
21 **Q. And in the context of Kargo's**
22 **business, is there any difference between the**
23 **term "SSP" or "supply side platform" and the**
24 **term "exchange"?**
25 A. No.

Page 12

1 **M. SHAUGHNESSY**
2 **Q. Which term are you most -- do you**
3 **use most in your business?**
4 A. Neither.
5 **Q. So you use them equally?**
6 A. Yes. And other words to describe
7 the business.
8 **Q. Are you familiar with the term**
9 **"Open Auction"?**
10 A. Yes.
11 **Q. What does "Open Auction" refer to**
12 **in the context of an SSP?**
13 A. Open Auction, in my understanding
14 or the way I would describe it is, when
15 advertisers do not have direct deals with
16 publishers and SSPs are surfacing the
17 inventory for these types of buys.
18 **Q. Does Kargo's SSP business include**
19 **Open Auction?**
20 A. It does.
21 **Q. What percentage of Kargo's SSP**
22 **business is Open Auction display advertising**
23 **transactions?**
24 A. Approximately 20 percent.
25 **Q. What is the other 80 percent?**

Page 13

1 **M. SHAUGHNESSY**
2 A. Private marketplace deals and/or
3 direct sell campaigns.
4 **Q. So I want to focus on the**
5 **20 percent of Kargo's SSP business that's**
6 **Open Auction display advertising**
7 **transactions.**
8 **Is that okay?**
9 A. Yes.
10 **Q. Today, what is Kargo's approximate**
11 **yearly gross revenue transactions for Open**
12 **Auction display advertising transactions?**
13 MS. MORGAN: Objection.
14 **Q. You may answer.**
15 A. It is -- can you repeat the
16 question.
17 **Q. Of course.**
18 **Today, what is Kargo's approximate**
19 **yearly gross revenue transacted for Open**
20 **Auction display advertising transactions?**
21 MS. MORGAN: Objection.
22 A. Approximately 30 to 50 million.
23 MS. SCHER: And just before we
24 continue, when we are dealing with
25 specific revenue information and

Page 14

1 M. SHAUGHNESSY
2 sensitive information, you know, we
3 would like to mark certain parts of
4 the transcript as confidential if they
5 are sensitive and competitive
6 information. And I don't know, you
7 know, how you want to -- I don't want
8 to keep interrupting, but should we be
9 designating as the questions come up?
10 MR. WOLIN: No, I don't think
11 that's necessary. On a Protective
12 Order, you have the ability to
13 designate it after the fact.
14 MS. SCHER: Okay.
15 BY MR. WOLIN:
16 **Q. I want to ask you next, then,**
17 **today, what is Kargo's approximate yearly net**
18 **revenue earned from those Open Auction**
19 **display advertising transactions?**
20 A. Approximately 4 to 10 million.
21 And I don't have the exact number off the top
22 of my head.
23 **Q. So what company offers the largest**
24 **SSP for Open Auction display advertising**
25 **transactions?**

Page 15

1 **M. SHAUGHNESSY**
2 A. Google.
3 **Q. And what's your basis for saying**
4 **that?**
5 A. Prior to my role at Kargo, I was a
6 publishing executive that worked with many
7 SSPs.
8 **Q. How would you characterize the**
9 **position of Google's SSP as compared to other**
10 **SSPs in the market?**
11 MS. MORGAN: Objection.
12 A. Can you repeat?
13 **Q. How would you characterize the**
14 **position of Google's SSP as compared to other**
15 **SSPs in the market?**
16 MS. MORGAN: Objection.
17 A. Google works with the publishers
18 in a unique way compared to other SSPs.
19 **Q. What do you mean by saying that**
20 **"Google works with publishers in a unique way**
21 **compared to other SSPs"?**
22 A. Publishers use both its ad serving
23 technologies as well as its sell side
24 functionality within the ad server.
25 **Q. What's your basis for saying that?**

Page 16

1 **M. SHAUGHNESSY**
2 A. My previous experience as a
3 publishing executive.
4 **Q. What impact does that have that**
5 **publishers use both ad server technologies as**
6 **well as SSP functionality? Sorry, strike**
7 **that. I'll rephrase the question.**
8 **What impact does that have that**
9 **publishers use Google for both publisher ad**
10 **server and SSP?**
11 A. Can you repeat the question?
12 **Q. What impact does that have that**
13 **publishers use Google for both publisher ad**
14 **server and for their SSP?**
15 MS. MORGAN: Objection.
16 A. The impact is, many of the
17 functionality is tied between the two
18 products and there are opportunities for the
19 Google SSP to compete more easily with direct
20 sold campaigns as well as the access to the
21 publisher inventory based on the Google
22 Publisher Tag, which is the basis for a lot
23 of the ad serving mechanisms of Google's DFP
24 or Google Ad Manager, as it's known today.
25 **Q. Is it your understanding that**

Page 33

1 **M. SHAUGHNESSY**
2 MS. MORGAN: Objection.
3 A. Can you repeat the question.
4 **Q. Are there any publisher inventory**
5 **sources that Google's AdX has access to that**
6 **Kargo's SSP does not but wishes to?**
7 MS. MORGAN: Objection.
8 A. Besides the O&O, I would not know
9 -- I don't know.
10 **Q. Does Kargo's SSP have access to**
11 **the same advertiser demand sources as**
12 **Google's AdX?**
13 MS. MORGAN: Objection.
14 A. I don't know.
15 **Q. Are you aware of any advertiser**
16 **demand sources that AdX -- Google's AdX has**
17 **access to that Kargo's SSP does not?**
18 A. No.
19 **Q. Does Kargo's SSP business include**
20 **working with publisher ad servers?**
21 A. Yes.
22 **Q. What company offers the largest**
23 **publisher ad server for web display**
24 **advertising?**
25 A. Google Ad Manager.

Page 34

1 M. SHAUGHNESSY
2 **Q. What's your basis for saying that?**
3 A. Most publishers we work with use
4 Google Ad Manager.
5 **Q. What other companies besides**
6 **Google offer publisher ad servers for web**
7 **display advertising?**
8 MS. MORGAN: Objection.
9 A. In my extensive publishing
10 experience and working with many publishers
11 and working at publishers, I cannot think of
12 one that is currently in use. But there used
13 to be a couple other options that did, which
14 include, if I'm not mistaken, AppNexus
15 provided this service, I believe AOL provided
16 this service, and OpenX may have provided
17 this service as well at one point.
18 **Q. Does Kargo offer a publisher ad**
19 **server that competes against Google Ad**
20 **Manager?**
21 A. No.
22 **Q. How would you characterize the**
23 **position of Google's publisher ad server as**
24 **compared to any other publisher ad servers?**
25 MS. MORGAN: Objection.

Page 35

1 M. SHAUGHNESSY
2 A. There's no comparison.
3 **Q. What do you mean by "there's no**
4 **comparison"?**
5 A. Based on what I know in the
6 industry and my extensive experience working
7 with agencies, publishers, vendors prior to
8 Kargo and during my experience at Kargo, it
9 is very common for publishers to use Google
10 Ad Manager for their display business.
11 **Q. But am I right in understanding**
12 **that your testimony is that Google is the**
13 **only publisher ad server on the market?**
14 MS. MORGAN: Objection.
15 A. Google is the dominant player.
16 **Q. So it's your view that Google is**
17 **the dominant publisher ad server on the**
18 **market today?**
19 A. Yes.
20 MS. MORGAN: Objection.
21 **Q. Why do you view Google's publisher**
22 **ad server as the dominant publisher ad**
23 **server?**
24 A. Because of the opportunities
25 between AdX and Google Ad Manager is the

Page 36

1 M. SHAUGHNESSY
2 primary reason from when I was a publisher.
3 **Q. And what's your basis for saying**
4 **that Google's publisher ad server is the**
5 **dominant publisher ad server today?**
6 MS. MORGAN: Objection.
7 A. Based on companies like Kargo and
8 others building infrastructure around Google
9 Ad Manager to build their businesses and
10 drive outcomes.
11 **Q. And what, if any, effect has**
12 **Google's position as the dominant publisher**
13 **ad server had on Kargo?**
14 A. It has influenced product and
15 engineering investments, learning and
16 development opportunities for existing
17 employees so that they can manage
18 relationships with our publishers, and it
19 also influences the way that we deliver our
20 campaigns.
21 **Q. What do you mean when you say that**
22 **its impacted product development?**
23 MS. MORGAN: Objection.
24 A. In order for Kargo to compete or
25 deliver high impact creatives, we need to

Page 49

1 M. SHAUGHNESSY
2 **Q. What do you mean by saying the**
3 **"publishers use DFP partially because of the**
4 **demand that AdX drives" into "the ad server"?**
5 A. There are functionality that helps
6 them operate their ad serving, but a big part
7 of why you would not switch if someone had
8 similar functionality is because of the way
9 that the products are tied.
10 **Q. And what do you mean when you say**
11 **"the way...the products are tied"?**
12 A. Based on my previous experience,
13 and I haven't been using Google Ad Manager as
14 extensively as I have in the past, to surface
15 advertising opportunities to AdX, the primary
16 vehicle to do that was using Google Ad
17 Manager to capitalize on that demand as a
18 publisher.
19 **Q. What's your basis for saying that**
20 **using Google Ad Manager is the primary**
21 **vehicle for surfacing advertising**
22 **opportunities to AdX?**
23 MS. MORGAN: Objection.
24 A. My experience building out ad
25 infrastructure for publishers as well as

Page 50

1 M. SHAUGHNESSY
2 maximizing yield.
3 **Q. How does the tie that you've**
4 **described between AdX and Google's publisher**
5 **ad server impact its publisher ad server's**
6 **position in the market?**
7 MS. MORGAN: Objection.
8 A. Can you repeat the question?
9 **Q. How does the tie that you've**
10 **described between AdX and Google's publisher**
11 **ad server impact Google's publisher ad**
12 **server's position in the market?**
13 MS. MORGAN: Objection.
14 This is not based on his
15 personal knowledge. He already said
16 it's based on his past experience.
17 MR. WOLIN: Counsel, you've made
18 your objection.
19 BY MR. WOLIN:
20 A. Publishers use Google Ad Manager
21 and would not switch, as far as I know,
22 unless there was an opportunity to access
23 this type of demand, as well as ensuring they
24 have all the functionality that goes into
25 serving a campaign that is provided by GAM.

Page 51

1 M. SHAUGHNESSY
2 **Q. And what's your basis for that**
3 **answer?**
4 A. My basis is, primarily me, as a
5 publishing executive, but also the many
6 conversations I have with publishers in my
7 current role and the way that we integrate
8 with them.
9 **Q. And how does that tie, as you**
10 **describe it, between AdX and Google's**
11 **publisher ad server impact AdX's position in**
12 **the market?**
13 MS. MORGAN: Objection.
14 A. Based on what I know, there are
15 opportunities for demand to be concentrated
16 from DV360 to AdX, which is then also
17 connected to Google Ad Manager.
18 **Q. Does the link between AdX and**
19 **Google's publisher ad server make it harder**
20 **for other SSPs to compete against Google?**
21 A. Yes.
22 MS. MORGAN: Objection.
23 **Q. How does the link between AdX and**
24 **Google's publisher ad server make it harder**
25 **for SSPs to compete against AdX?**

Page 52

1 **M. SHAUGHNESSY**
2 A. Well, for many years, Google was
3 able to use products called dynamic
4 allocation, and enhanced dynamic allocation,
5 and prior to header bidding, there wasn't a
6 dynamic opportunity for different vendors to
7 compete within the ad stack.
8 **Q. What's your basis for giving that**
9 **answer?**
10 A. My experience managing programatic
11 yield as well as setting up the header
12 infrastructure for many publishers, based on
13 publishers I've also consulted for. In
14 addition, my experience building out the
15 programatic infrastructure at Kargo.
16 **Q. Are there any other ways in which**
17 **the link between AdX and Google's publisher**
18 **ad server makes it harder for other SSPs to**
19 **compete against AdX?**
20 MS. MORGAN: Objection.
21 A. Yes.
22 **Q. What are those other ways?**
23 A. Well, over the years, there have
24 been things like First Look, which gives AdX
25 the opportunity to compete with sponsorship

Page 69

1 **M. SHAUGHNESSY**
2 **display advertising versus social media**
3 **advertising?**
4 MS. MORGAN: Objection.
5 A. I wouldn't want to speculate on
6 their marketing objectives. I can only speak
7 to my experiences in helping provide
8 solutions in both environments.
9 **Q. From an advertiser perspective,**
10 **how is the purchase of Open Auction display**
11 **advertising interchangeable with the purchase**
12 **of owned and operated display inventory**
13 **directly from a publisher?**
14 MS. MORGAN: Objection.
15 A. Can you repeat the question.
16 **Q. From an advertiser perspective,**
17 **how is the purchase of Open Auction display**
18 **advertising interchangeable with the purchase**
19 **of owned and operated display inventory**
20 **directly from the publisher?**
21 MS. MORGAN: Objection.
22 A. They can differ.
23 **Q. How do they differ?**
24 MS. MORGAN: Objection.
25 A. They are the same in the sense

Page 70

1 M. SHAUGHNESSY
2 that they operate through the same ad server
3 and, in most instances, is the same Google
4 Publisher Tag that is serving the campaign.
5 They differ in that it is booked
6 inventory that is reserved within the ad
7 server, and then there could be other
8 targeting mechanisms that are done on the
9 sell side or by the publisher that create an
10 experience that could be more tailored to the
11 audience or the outcomes of the campaign so
12 that it performs better.
13 **Q. I want to ask you next about the**
14 **link between GDN, AdX, and DFP and the effect**
15 **that that's had on the ad tech industry.**
16 **Do you have that in mind?**
17 MS. MORGAN: Objection.
18 A. Yes.
19 **Q. So how, if at all, does the link**
20 **between GDN, AdX, and DFP affect competition**
21 **between publisher ad servers?**
22 MS. MORGAN: Objection.
23 A. It inhibits meaningful
24 competition.
25 **Q. How does it inhibit meaningful**

Page 71


1 **M. SHAUGHNESSY**
2 **competition?**
3 A. From my understanding, the systems
4 operate best together.
5 **Q. And what's your basis for saying**
6 **that it "inhibits meaningful competition"?**
7 MS. MORGAN: Objection.
8 A. If you cannot set up this demand
9 in a different way, in a different ad server,
10 or if the functionality is not optimized,
11 publishers need to be able to maximize their
12 revenues.
13 **Q. I want to ask you a slightly**
14 **different question.**
15 **How, if at all, does the link**
16 **between GDN, AdX, and DFP affect competition**
17 **between SSPs?**
18 MS. MORGAN: Objection.
19 A. SSPs are unable to compete the
20 same way as Google.
21 **Q. How are SSPs unable to compete the**
22 **same way as Google?**
23 A. They are unable to compete based
24 on the access to inventory and the way that
25 the ad server is set up.

Page 72

1 M. SHAUGHNESSY
2 **Q. What do you mean when you say**
3 **"they are unable to compete based on the**
4 **access to inventory"?**
5 A. In a publisher's ad server -- and
6 when I discuss ad server, I'm primarily
7 talking about Google Ad Manager -- there is a
8 hierarchy of the different types of line item
9 types as well as the configurable priorities,
10 which are numbers.
11 In my past experience and how I
12 understand the ad servers, they are 1 through
13 16. 1 through 4 are sponsorship line items,
14 which are usually reserved for the most
15 targeted or high impact campaigns. There are
16 standard line items, which are booked between
17 5 and 8. And then, traditionally, price
18 priority line items are, you know, 9 through
19 15, and 16 is house.
20 This has evolved with time, but,
21 traditionally, other SSPs are nested at price
22 priority 12 and they are not configured in a
23 way that they can look up and compete based
24 on some sort of pacing logic for any of those
25 sponsorship type of opportunities if they

Page 177			
1			
2	E X H I B I T S		
3			
4			
5	EXHIBIT	EXHIBIT	PAGE
6	NUMBER	DESCRIPTION	
7			
8	Exhibit 1001	KARGO_000199	98
9	Exhibit 1002	spreadsheet	98
10	Exhibit 1003	KARGO_000073 through	129
11		'114	
12	Exhibit 1004	Document titled	134
13		"Avoiding A Bad Google	
14		Breakup" dated June 1,	
15		2021	
16	Exhibit 1005	Document titled	145
17		"France Paves The Way	
18		For More Action	
19		Against Google's	
20		Unfair Practices"	
21		dated August 5, 2021	
22			
23			
24			
25			

Page 178			
1			
2	Exhibit 1006	Document titled	154
3		"Publishers Have a	
4		Window of Opportunity	
5		to Change Google and	
6		Facebook" dated	
7		January 26, 2021	
8			
9			
10			
11			
12	I N D E X		
13			
14	EXAMINATION BY		PAGE
15			
16	MR. WOLIN		3
17	MS. MORGAN		115
18	MR. WOLIN		169
19			
20			
21			
22	INFORMATION AND/OR DOCUMENTS REQUESTED		
23	INFORMATION AND/OR DOCUMENTS		PAGE
24	(NONE)		
25			

Page 179			
1			
2	C E R T I F I C A T E		
3			
4	STATE OF NEW YORK)	
		: SS.:	
5	COUNTY OF NASSAU)	
6			
7	I, REBECCA SCHAUMLOFFEL, a Notary		
8	Public for and within the State of New York,		
9	do hereby certify:		
10	That the witness whose examination		
11	is hereinbefore set forth was duly sworn and		
12	that such examination is a true record of the		
13	testimony given by that witness.		
14	I further certify that I am not		
15	related to any of the parties to this action		
16	by blood or by marriage and that I am in no		
17	way interested in the outcome of this matter.		
18	IN WITNESS WHEREOF, I have hereunto		
19	set my hand this 10th day of August, 2023.		
20			
21	REBECCA SCHAUMLOFFEL		
22			
23			
24			
25			

Page 180

1 ERRATA SHEET FOR THE TRANSCRIPT OF:

2 Case Name: In Re: US, et al. V. Google LLC

3 Dep. Date: August 9, 2023

4 Deponent: Michael Shaughnessy

5 CORRECTIONS:

	Pg.	Ln.	Now Reads	Should Read	Reason
7	—	—	_____	_____	_____
8	—	—	_____	_____	_____
9	—	—	_____	_____	_____
10	—	—	_____	_____	_____
11	—	—	_____	_____	_____
12	—	—	_____	_____	_____
13	—	—	_____	_____	_____
14	—	—	_____	_____	_____
15	—	—	_____	_____	_____
16	—	—	_____	_____	_____
17				_____	

18